

-YALKUT & ISRAEL, ESQS.
(Arlen S. Yalkut) (AY1522)
Attorneys For Plaintiff
PATRICK WILLIS
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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PATRICK WILLIS,

Plaintiff,

- against -

07 CV 09240 (DLC)
ECF CASE
RULE 26 (a) (1)
DISCLOSURES,

**THE CITY OF NEW YORK and "JOHN
DOE" POLICE OFFICERS INDIVIDUALLY
TRUE NAMES UNKNOWN,**

Defendants.

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The plaintiff, by and through his attorneys, Yalkut & Israel, pursuant to Rule 26(a)(1) of The Federal Rules of Civil Procedures set forth his initial disclosures as follows:

i) The names and addresses of persons likely to have discoverable information are as follows:

Michael McCarroll, 5350 Carol Plantation Road Apt. 5G, Theodore, Alabama 36582;
(The person arrested together with the plaintiff)

Jermaine Brown and Neisher Young, 1113 Andrews Street, Pritchard, Alabama 36610
(The record leaseholders of the apartment where arrest took place)

Anna Solano, 328 East 197th Street Apt. 2G, Bronx, New York 10458
(A person who previously had a key to the apartment.)

The following persons are individuals who observed the plaintiff in police custody in the vicinity of the apartment building:

Nikki Branch, 106 West 142nd Street Apt. 3D, New York, New York 10030

Latasha Simmons, 258 East 4th Street Apt. 2G, New York, New York 10019

Tiara Linton, 421 West 162nd Street, Apt. 2B, New York, New York 10032

Terel Howard, 106 West 142nd Street Apt. 3-D, New York, New York 10030

Lamar Jader, 412 West 148th Street Apt. 5-E, New York, New York 10031

Teryca Warner, 143 West 111th Street Apt. 1B, New York, New York 10026

Other civilians were present but their names and addresses are presently unknown to plaintiff or his Counsel.

Police Officer Christina Rijo, 32nd Precinct
Several other Police Officers (At least three who entered the apartment) and approximately ten officers out in the street - The names of these Officers are currently unknown to the plaintiff.

ii) Summons served upon the plaintiff by the arresting officer (see copy annexed; Certificate of Disposition (see copy annexed) These documents were attached to the Complaint and made a part thereof; Copies of repair bills for damages to the apartment door and lock as well as to plaintiff's bed (see copies annexed hereto).

iii) Property damage - \$1,360.63

Lost wages - \$2,400.00

Unlawful Imprisonment - \$ 1,000,000.00

False Arrest - \$ 1,000,000.00

Pain and suffering - \$ 1,000,000.00

Violation of plaintiff's Civil Rights - \$ 2,000,000.00

Malicious prosecution - \$2,000,000.00

Intentionally infliction of mental distress and embarrassment -
\$ 1,000,000.00

Punitive damages - \$2,000,000.00

iv) No insurance policies for the injuries and damages sustained are known
by the plaintiff to exist.

Dated :April 24, 2008
Bronx, New York

YALKUT & ISRAEL, ESQS.
Attorneys for Plaintiff
PATRICK WILLIS
865-B Walton Avenue
Bronx, New York 10451
(718) 292-2952

By: 

Arlen S. Yalkut (AY-1522)


To: Michael A. Cardozo Corporation Counsel
(Amy Okereke, Of Counsel)
100 Church Street
New York, New York 10007
(212) 788-9790

DECLARATION OF SERVICE BY MAIL

I, ARLEN S. YALKUT, declare, pursuant to 28 U.S.C. Section 1746, under the penalties of perjury that on April 24, 2008, I served a copy of the Rule 26(a)(1) Disclosures upon the Attorneys for the Defendants, by depositing a copy of same in a first class postpaid properly addressed wrapper, in an official post office depository under the exclusive care and custody of The United States Postal Service within the State of New York, directed to said counsel of record at the address set forth below, being the address designated by plaintiff for that purpose:

Amy Okerke, Esq.
Michael A. Cardozo
Attorney for Defendant
100 Church Street
New York, New York 10007

Dated: Bronx, New York
April 24, 2008


ARLEN S. YALKUT

MICHAEL A. CARDOZO CORPORATION COUNSEL
100 CHURCH STREET